

unbundled elements because Congress intended that incumbent LECs offer interconnection and unbundled elements as long as technically feasible, regardless of cost.<sup>72/</sup>

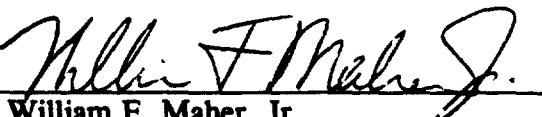
Incumbent LECs cannot unbundle an element that does not exist at all or does not exist in the requested location. This is a matter of technological and physical reality. The 1996 Act provides that competitors have access to the existing network, not a technological ideal as conceived by competitors. The requested clarification also would minimize the possibility of substantial, inefficient expenditures by incumbent LECs to meet the projected needs of aspiring competitors that ultimately are not realized.

### III. CONCLUSION

Consistent with this Reply, LECC respectfully requests the Commission to grant its petition to reconsider certain aspects of the First Order and to clarify others, while denying or dismissing oppositions thereto.

Respectfully submitted,

The Local Exchange Carrier Coalition

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November 14, 1996

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<sup>72/</sup> MCI Opposition at 12-13.

## **Attachment 1**

### **Names of Cited Parties and Short Forms**

**Airtouch Communications, Inc. ("AirTouch")**  
**Ameritech ("Ameritech")**  
**Arch Communications Group, Inc. ("Arch")**  
**Association for Local Telecommunications Services ("ALTS")**  
**AT&T Corporation ("AT&T")**  
**Cellular Telecommunications Industry Association ("CTIA")**  
**Comcast Cellular Communications, Inc./Vanguard Cellular Systems, Inc.**  
**("Comcast/Vanguard")**  
**Competitive Telecommunications Association ("CompTel")**  
**Cox Communications, Inc. ("Cox")**  
**General Communication, Inc. ("GCI")**  
**Kalida Telephone Company, Inc. ("Kalida")**  
**MCI Communications Corporation ("MCI")**  
**MFS Communications Company, Inc. ("MFS")**  
**National Cable Television Association, Inc. ("NCTA")**  
**NYNEX Telephone Companies ("NYNEX")**  
**Paging Network, Inc. ("PageNet")**  
**Southern New England Telephone Company ("SNET")**  
**Southwestern Bell Telephone Company ("SWBT")**  
**Sprint Corporation ("Sprint")**  
**Sprint Spectrum L.P. ("Sprint Spectrum")**  
**Telecommunications Resellers Association ("TRA")**  
**Teleport Communications Group Inc. ("Teleport")**  
**Time Warner Communications Holdings, Inc. ("Time Warner")**  
**United States Telephone Association ("USTA")**  
**US ONE Communications Corporation ("US One")**  
**US West, Inc. ("US West")**  
**WorldCom, Inc. ("WorldCom")**

## **CERTIFICATE OF SERVICE**

I, Mary-Helen Dove, do hereby certify that a copy of the Reply of the Local Exchange Carrier Coalition ("LECC") to Oppositions, filed on November 14, 1996, has been served by mail, unless otherwise indicated, upon the following:

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